

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as a representative of

THE COMMONWEALTH OF PUERTO RICO
et al.

Debtors.¹

PROMESA Title III

No.: 17-BK-3283-LTS
(Jointly Administered)

**This filing relates to the
Commonwealth.**

EMPRESAS OMAJEDE’S REPLY TO THE COMMONWEALTH’S RESPONSE (DKT. 24854)
TO THE MOTION FOR LEAVE TO AMEND (DKT. 24818)

TO THE HONORABLE UNITED STATES DISTRICT JUDGE LAURA TAYLOR SWAIN:

COMES NOW, EMPRESAS OMAJEDE INC., by and through the undersigned counsel, and, in response to Dkt. 24854, states, alleges and prays.

1. On July 31, 2023, Empresas Omajedes filed a Motion for Leave to Amend² its proof of claim and for other relief. Dkt. 24818.

2. On August 1st, 2023, the Court entered the *Order Scheduling Briefing of Motion for Leave to Amend Empresas Omajede’s Proof of Claim (Kroll Claim #70324), for Leave to File Spanish Language Documents, and for Order granting 30 days to Obtain Certified Translations* (the “Briefing Schedule Order”). Dkt. 24823.

¹ The Last Four Digits of the Federal Tax ID of the Commonwealth of Puerto Rico (the Debtor in Bankruptcy Case No. 17-BK-3283 (LTS)) is 3481.

² The motion was titled *Motion for Leave to Amend Empresas Omajede’s Proof of Claim (Kroll Claim #70324), for Leave to File Spanish Language Documents, and for Order granting 30 days to Obtain Certified Translations*. Dkt. 24818.

3. On August 8, 2023, in compliance with the Briefing Schedule Order, the Oversight Board filed a motion (the “Commonwealth Response”) titled *Response of the Commonwealth of Puerto Rico to Empresas Omajede’s Proof of Claim (Kroll Claim #70324), for Leave to File Spanish Language Documents, and for Order granting 30 days to Obtain Certified Translations [ECF 24818]*, in which it stated that it did not oppose the relief sought in the Motion for Leave, as long as the amended proof of claim with translations was filed by August 30, 2023, the commonwealth’s claim objection is adjourned until the next hearing on October 4, 2023 and the Commonwealth’s reply to the response to the claim objection is then due on September 20, 2023 which is 14 days before the next hearing. Dkt. 24854.

4. In compliance with the Briefing Schedule Order, Empresas Omajede informs that it does not object to the briefing schedule and hearing adjournment requested in the Commonwealth’s Response.

5. Therefore, Empresas Omajede moves for the Motion to Amend to be granted subject to the aforementioned briefing schedule and hearing adjournment.

WHEREFORE, Empresas Omajede respectfully requests that the Court enter an order granting Empresas Omajede leave to amend its proof of claim in the First Amended POC (Kroll Claim #70324) as specified above, and grant any other relief that it deems just and proper or that may be granted.

CERTIFICATION OF SERVICE: IT IS HEREBY CERTIFIED that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF

system, which will send a true and exact copy of this paper to all registered participants, including Ricardo Burgos Vargas and Martin J. Bienenstock, the attorneys for the the Financial Oversight and Management Board for Puerto Rico as representative for the Commonwealth of Puerto Rico, that filed the **Fourth Objection**.

RESPECTFULLY SUBMITTED.

In San Juan, PR, this 15th day of August, 2023.

DML | Diaz Mayoral Law
Attorney for Empresas Omajede Inc.

s/ Monique Diaz Mayoral
USDC-PR No. 225712
151 San Francisco Street
San Juan, PR 00901
(754)755-5508
m@diazmayorallaw.com

EXHIBIT A
Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD
FOR PUERTO RICO,

as representative of

COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

ORDER

This matter is before the Court on Empresas Omajede's *Motion for Leave to Amend Proof of Claim, (Kroll Claim #70324) for Leave to File Spanish Language Documents, and For Order Granting 30 days to Obtain Certified Translations* (Dkt. No. 24818) (the "Motion"), which seeks retroactive leave to amend its proof of claim in the First Amended POC (Kroll Claim #70324) as specified, as well as other relief; the Commonwealth's response (Dkt. 24854) and

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Empresas Omajede's Reply (Dkt. ____). Upon consideration of the Motion, the response and the reply; and after due deliberation thereon; and the Court having found that good and sufficient cause exists for the granting of the relief set forth herein; it is hereby ORDERED THAT:

1. The Motion is GRANTED and
2. Empresas Omajede may file an amended proof of claim that amends Empresas Omajede's previously amended proof of claim (Kroll Claim #70324), as specified in the Motion, by **August 30, 2023**.
3. Thereafter, the Commonwealth may file a reply to Empresas Omajede's response (Dkt. 23272) to the Claim Objection (Dkt. 24186) by **September 20, 2023**.
4. The consideration of the Claim Objection (Dkt. 24186) is adjourned to the next omnibus hearing on **October 4, 2023**.
5. This Order resolves Docket Entry No. 24818 in Case No. 17-BK-3283.

SO ORDERED.

/ s / Laura Taylor Swain
Laura Taylor Swain
United States District Judge

DATED: